

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:)	Case Number 07-02546-dd
)	
BROAD CREEK EDGEWATER, LP,)	
)	Involuntary Petition
DEBTOR)	Chapter 7
_____)	

OBJECTION TO MOTION TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 11

NOW COME the Edgewater on Broad Creek Horizontal Property Regime and the Edgewater on Broad Creek Property Owners' Association (the "Objecting Parties"), by and through the undersigned counsel, and give notice of their present objection to the Motion to Convert the within case from a Chapter 7 case to a Chapter 11 case filed by the Debtor. The Objecting Parties herein are the co-owners within a horizontal property regime as created by master deed pursuant to the South Carolina Horizontal Property Regime Act and the property owners' association formed pursuant to the master deed to manage the horizontal property regime and administer its affairs. The Objecting Parties have a legal interest in the land immediately adjacent to the lands of the Debtor and share common road access and other amenities. The Objecting Party(s) joined the Involuntary Petition filed in this case.

While the Objecting Party(s) are presently satisfied with the Debtor's post petition management of their common amenities, this objection to the proposed conversion is made because as of the date hereof, the moving party, the Debtor, has not to date demonstrated with specificity how the Objecting Party(s)' unique land use concerns and future financial demands would be better served in a Chapter 11 case as opposed to a Chapter 7 liquidation. This objection is conditional and may be withdrawn prior to the hearing on the matter.

WHEREFORE, the Broad Creek Horizontal Property Regime and the Edgewater on Broad Creek Property Owners Association object to the conversion of the case prior to a hearing on the matter and request the opportunity to participate in the hearing on Debtor's Motion on July 13, 2007.

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